

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Louis A. Kessler (SBN 243703)  
Elissa A. Buchanan (State Bar No. 249996)  
Travis Manfredi (State Bar No. 281779)

**JOSEPH SAVERI LAW FIRM, LLP**

601 California Street, Suite 1000  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
lkessler@saverilawfirm.com  
eabuchanan@saverilawfirm.com  
tmanfredi@saverilawfirm.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

J. DOE 1, et al.,  
Individual and Representative Plaintiffs,  
v.  
GITHUB, INC., et al.,  
Defendants.

Lead Case No. 4:22-cv-06823-JST

**NOTICE OF SUPPLEMENTAL  
AUTHORITY RELEVANT TO  
PLAINTIFFS' OPPOSITIONS TO  
DEFENDANTS' MOTIONS TO  
DISMISS**

Plaintiffs hereby notify the Court of newly issued authority relevant to their Oppositions to Defendants' Motions to Dismiss (ECF Nos. 140, 142). On September 25, 2023, the United States District Court for the District of Delaware issued its decision in *Thomson Reuters Enter. Ctr. GmbH v. Ross Intel. Inc.*, \_\_\_ F. Supp. 3d \_\_\_, 2023 WL 6210901 (D. Del. Sept. 25, 2023), explaining, among other things, that "[r]estricting a user's use of copyrighted material" as the basis of a tortious interference claim is not preempted by the Copyright Act. *Id.* at \*12. A true and correct copy of the decision is attached hereto as **Exhibit 1**.

Dated: September 27, 2023

By: /s/ Travis Manfredi  
Travis Manfredi

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Louis A. Kessler (SBN 243703)  
Elissa A. Buchanan (State Bar No. 249996)  
Travis Manfredi (State Bar No. 281779)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1000  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
lkessler@saverilawfirm.com  
eabuchanan@saverilawfirm.com  
tmanfredi@saverilawfirm.com

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, #406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

*Counsel for Plaintiffs and the Proposed Class*